

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION

GOOGLE, INC.

PLAINTIFF

V.

CIVIL ACTION NO. 3:14-CV-981-HTW-LRA

JIM HOOD, in his official capacity
as Attorney General of the State of
Mississippi

DEFENDANT

**JOINT MEMORANDUM OF PARTIES
IN SUPPORT OF MOTION TO EXTEND DEADLINES**

On January 14, 2016, the Court entered an Agreed Order establishing the following deadlines:

1. Defendant's designation of experts by March 15, 2016;
2. Plaintiff's designation of rebuttal experts by March 30, 2016;
3. Non-expert discovery due March 18, 2016;
4. All expert depositions completed (or noticed, if schedules prohibit completion) by April 15; and
5. Dispositive motions due by April 29, 2016.

(ECF 204).

Although Google and the Attorney General have been working diligently to attempt to complete discovery, multiple depositions will likely be needed. Additionally, it is anticipated that expert designations may be dependent on the information learned in the depositions.

Through mutual agreement of the parties, the eight (8) previously-noticed depositions of Google representatives and employees have been postponed until the parties receive guidance from the

Court regarding the pending discovery motions. Therefore, Google and the Attorney General jointly move the Court for an Order extending the current deadlines as follows:

1. Defendant's designation of experts by June 15, 2016;
2. Plaintiff's designation of rebuttal experts by June 30, 2016;
3. Non-expert discovery due June 20, 2016;
4. All expert depositions completed (or noticed, if schedules prohibit completion) by July 15; and
5. Dispositive motions due by July 29, 2016.

Extending the deadlines should allow sufficient time for the resolution of the pending discovery motions and for the orderly completion of discovery.

Accordingly, Google, Inc. and Jim Hood, in his official capacity as Attorney General of the State of Mississippi, jointly move the Court to extend the deadlines as referenced above.

DATED March 16, 2016.

/s/ Fred Krutz

Fred Krutz, MSB No. 4270
FORMAN WATKINS & KRUTZ LLP
200 South Lamar Street, Suite 100
Jackson, Mississippi 39201
Post Office Box 22608
Jackson, Mississippi 39225-2608
Phone: (601) 960-8600
Facsimile: (601) 960-8613
fred.krutz@formanwatkins.com
Attorney for Plaintiff Google, Inc.

/s/John W. Kitchens

John W. Kitchens, MSB No. 101137
Kitchens Law Firm, P.A.
Post Office Box 799
Crystal Springs, Mississippi 39059
Phone: (601) 892-3067
Facsimile: (601) 892-3057
jkitchens@kitchenslaw.net
Attorney for Jim Hood, Attorney
General of the State of Mississippi,
in his official capacity

CERTIFICATE OF SERVICE

I certify that I electronically filed the forgoing with the Clerk of the Court for the United States District Court for the Southern District of Mississippi by using the Court's CM/ECF system on March 16, 2016. I further certify that all parties are represented by attorneys who are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

/s/ Fred Krutz

Fred Krutz